

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

UNITED STATES OF AMERICA, STATE OF
GEORGIA, STATE OF COLORADO, AND
STATE OF SOUTH CAROLINA,

Plaintiffs,

ex rel. ROBERT MATHEWSON,

Plaintiff-Relator,

v.

PREMIER MEDICAL, INC., KEVIN S.
MURDOCK, MICHAEL CONROY, FREEDOM
MEDICAL LABS, LLC, ROBERT ALAN
RICHARDSON, AND EDWARD BURCH,

Defendants.

C/A No. 6:18-cv-00165-TMC

**DEFENDANT FREEDOM
MEDICAL LABS, LLC'S
ANSWERS TO LOCAL
RULE 26.01
INTERROGATORIES**

Defendant Freedom Medical Labs, LLC ("Freedom") submits the following answers to the Local Rule 26.01 Interrogatories:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: None.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Should the claims against Freedom survive Freedom's motion to dismiss and any pre-trial motions, the claims should be tried before a jury pursuant to Federal Rule of Civil Procedure 38(a) and the Seventh Amendment to the United States Constitution.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: Freedom is a privately owned company which does not own ten percent or more of the outstanding shares of any publicly owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: Freedom is the defendant and has not challenged the appropriateness of the Greenville Division for Plaintiffs' claims.

(E) Is this action related in whole or in part to any other matter filed in the District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should

be assigned to a single judge will be determined by the Clerk of court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for another reason would entail substantial duplication of labor if heard by different judges.

ANSWER: Freedom is not aware of any other action filed in this District to which this action is related in whole or in part.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of any amended summons and pleading reflecting the correct identification

ANSWER: Not applicable.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the bases of said liability.

ANSWER: Freedom denies that it is liable to Plaintiffs. Freedom is still evaluating the potential liability of other persons or entities.

Respectfully submitted,

/s/ Gregory P. Harris
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*Attorney for Defendants Freedom Medical
Labs, LLC and Robert Alan Richardson*

This 22nd day of October

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this day of October 22, 2021, a copy of the foregoing
**DEFENDANT FREEDOM MEDICAL LABS, LLC'S ANSWERS TO LOCAL
RULE 26.01 INTERROGATORIES** was served by the Court's ECF system upon all
counsel of record.

/s/Gregory P. Harris
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